Stephen W. Spence (pro hac vice pending)
Phillips, Goldman & Spence, P.A.
1200 N. Broom Street
Wilmington, DE 19806
(302) 655-4200 Telephone
(302) 655-4210 Facsimile
Attorneys for Angela Urquhart and Glen Urquart,
individually and as trustee of certain trusts for the benefit of their children

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

GENERAL MOTORS CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 09-50026-reg

(Jointly Administered)

MOTION FOR ADMISSION TO PRACTICE, Pro Hac Vice

I, Stephen W. Spence, Esquire, a member in good standing of the bar in the State of Delaware, request admission, *pro hac vice*, before the Honorable Robert E. Gerber, to represent the Angela Urquhart and Glen Urquart, individually and as trustee of certain trusts for the benefit of their children, a creditor in the above-reference case.

My address is: Phillips, Goldman & Spence, P.A.,1200 North Broom Street, Wilmington, Delaware 19806.

My email address is: sws@pgslaw.com; my telephone number is (302) 655-4200.

I agree to pay the fee of \$25 upon approval by this Court admitting me to practice *pro hac vice*.

PHILLIPS, GOLDMAN & SPENCE, P.A.

Dated: June 19, 2009 Wilmington, Delaware /s/ Stephen W. Spence, Esquire STEPHEN W. SPENCE, ESQUIRE(DE No. 2033) 1200 N. Broom Street Wilmington, DE 19806 (302) 655-4200